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Capital One Bank (USA), N.A.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JENNIFER BLAZEIVICH,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC, EQUIFAX INFORMATION SERVICES,
LLC, TRANS UNION, LLC, CAPITAL ONE
BANK (USA), N.A., SYNCHRONY BANK,
AND WEBBANK.

Defendants.

Case No.: 2:20-cv-01250-JCM-BNW

**REVISED STIPULATION AND ORDER
FOR SECOND EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

Plaintiff Jennifer Blazeivich (“Blazeivich”) and Defendant, Capital One Bank (USA), N.A. (“Capital One”), by and through their counsel of record, hereby submit this Stipulation To Extend Capital One’s Time to Respond to Complaint, as follows:

WHEREAS:

1. Plaintiff filed the Complaint in this matter in this Court on July 7, 2020;
2. Capital One was served with the Complaint on July 14, 2020, but due to an inadvertent error, did not retain counsel until August 14, 2020, and at that time counsel for Capital One immediately contacted counsel for Plaintiff to request an extension of time to respond to the Complaint;

1 3. Plaintiff consented to the extension, and on August 14, 2020, the parties filed a
2 Stipulation for Extension of Time until August 28, 2020 for Capital One to respond to the Complaint,
3 which was granted on August 18, 2020;

4 4. On August 19, 2020, counsel for Capital One contacted counsel for Plaintiff to discuss
5 Capital One's initial findings from a search of its records and requested additional information from
6 Plaintiff in response to these findings;

7 5. On August 25, 2020, counsel for Capital One conferred with counsel for Plaintiff
8 regarding Capital One's initial findings and request for information, which may have an impact on
9 whether an early resolution is available before incurring further litigation costs;

10 6. During this conference, counsel for Plaintiff stated that his client needed more time
11 to respond, and that Plaintiff would stipulate an additional brief, two-week extension for Capital One
12 to file its response, up to and including, September 11, 2020, to allow the parties time to continue
13 exploring an early resolution in the interest of judicial economy;

14 7. Accordingly, on August 26, 2020, Capital One filed a Stipulation and Order for a
15 Second Extension of Time to Respond to the Complaint, which this Court denied without prejudice
16 for lacking explanation for the request;

17 8. Therefore, the parties submit this Revised Stipulation and Order for a Second
18 Extension of Time to Respond to the Complaint containing the explanation and certifying that the
19 parties agree that good cause exists to further extend Capital One's responsive pleading deadline until
20 and including September 11, 2020.

1 NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:

2 Capital One's time to file a responsive pleading to Plaintiff's Complaint is extended. Capital
3 One shall file its responsive pleading on or before September 11, 2020.

4 DATED this 2nd day of September, 2020

DATED this 2nd day of September, 2020

5 By: /s/ Jeff Silvestri

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By: /s/ Steven A. Alpert

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10 *Attorneys for Capital One Bank (USA), N.A.*

Attorney for Plaintiff, Jennifer Blazeovich

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13 IT IS SO ORDERED:

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16 UNITED STATES MAGISTRATE JUDGE

17 DATED: September 3, 2020